

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION

IN RE:	)	
	)	
MASEPOHL MEATS, INC.	)	CASE NO.: 19-21462
	)	<u>CHAPTER 7 BANKRUPTCY</u>
Debtor	)	
	)	

**APPLICATION TO REOPEN ESTATE WITH DEFERRED FEE**

Comes now Daniel L. Freeland and requests the Court to reopen the above-captioned estate with a deferred fee, and in support thereof, states as follows:

1. The Debtor filed bankruptcy before the United States Bankruptcy Court for the Northern District of Indiana, Hammond Division, on May 30, 2019.
2. Daniel L. Freeland was duly appointed Bankruptcy Trustee on May 30, 2019.
3. Trustee filed his Report of No Distribution on October 15, 2019, and the Court entered an Order Approving Trustee's Report of No Distribution and Closing Estate on November 25, 2019.
4. Trustee has discovered that the Debtor is due a substantial tax credit, and said tax credit is property of the bankruptcy Estate.
5. Trustee intends to pursue the collection of said tax credit and use the proceeds to pay creditors of this Estate.
6. That the Trustee is currently without funds to pay the reopening fee, and asks that the same be deferred until such time as distribution is made in this case.

WHEREFORE, Trustee asks that the estate be reopened, that the fee for reopening this case be deferred, and for all other just and proper relief under the circumstances.

Respectfully submitted:

**DANIEL L. FREELAND & ASSOCIATES, P.C.**

/s/ Daniel L. Freeland  
DANIEL L. FREELAND, Trustee  
9105 Indianapolis Blvd.  
Highland, Indiana 46322  
(219) 922-0800

**CERTIFICATE OF SERVICE**

I hereby certify that on the 25<sup>th</sup> day of April, 2023, a copy of the attached was filed electronically with the Clerk of the Court using the CM/ECF System, which sent notification of such filing to all counsel of record including:

United States Trustee  
Kim Mourtaides

I further hereby certify that a true and accurate copy of the attached was served by depositing in the U.S. Mail on April 25, 2023, upon the following:

Masepohl Meats, Inc., 2421 Tulip Tree Lane, Dyer, IN 46311

/s/ Daniel L. Freeland  
DANIEL L. FREELAND